

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Civil Action No. 07-570
)
)
VARIOUS PARCELS OF REAL)
PROPERTY, VARIOUS VEHICLES,)
AND JEWELRY,)
)
Defendants.)

STIPULATION

The United States of America and Diann Bobby ("Bobby"), by and through their respective counsel, and with the intent to be legally bound hereby, stipulate and agree as follows:

1. Pursuant to 21 U.S.C. § 881(a)(6), the United States instituted this civil forfeiture action by filing a Verified Complaint for Forfeiture against various parcels of real property, various vehicles and jewelry listed in Exhibit A of the Complaint (the "Defendant Property"). The Defendant Property includes the real property located at Lot 11, Steele-Hohman Plan No. 4, Salem Township, PA (the "Salem Township Property").
2. The United States and Bobby agree to settle all matters relating to the rights of Bobby to file a claim and/or answer at Civil Action Number 07-570; to the filing of the forfeiture case at Civil Action Number 07-570; to the seizure and/or arrest of the Defendant Property; to any and all defenses of Bobby to the forfeiture action at Civil Action Number 07-570; and/or to any and all right, title and/or interest of Bobby in the Defendant Property.
3. Bobby waives her right to file a claim and/or answer at Civil Action No. 07-570, or to otherwise contest the forfeiture action at Civil Action No. 07-570. The United States releases its

forfeiture interest in the Salem Township Property, and will satisfy its Lis Pendens against the Salem Township Property. The Salem Township Property is dismissed as a Defendant Property in this case. All of the right, title and interest of Bobby is divested in all Defendant Property, other than the Salem Township Property, that is the subject of Civil Action No. 07-570.

4. Bobby releases and forever discharges the United States, its agents, servants, attorneys, employees and assigns from any and all actions, causes of action, suits, proceedings, debts, dues, contracts, judgments, damages, claims and/or demands which Bobby and/or her heirs and/or assigns, now have or may hereafter acquire against the United States, its agents, servants, attorneys, employees and assigns, with regard to the rights of Bobby to file a claim and/or answer at Civil Action Number 07-570; to the filing of the forfeiture case at Civil Action Number 07-570; to any and all defenses of Bobby to the forfeiture action at Civil Action Number 07-570; and/or to any and all right, title and/or interest of Bobby in the Defendant Property that is the subject of Civil Action No. 07-570.

With the intent to be legally bound hereby, the undersigned execute this Stipulation this

15th day of September, 2008:

Respectfully submitted,

MARY BETH BUCHANAN
United States Attorney

By:



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